

Message

**From:** Storm, Linda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=473A11576E9E401B98840BB1A54FBAC7-STORM, LINDA]  
**Sent:** 6/2/2017 6:52:59 PM  
**To:** Thiesing, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7b594716a844c65bd55c43a6b033f58-Thiesing, Mary Ann]; Bujak, Charissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7145378c12f43df9e2bf70e7d951196-Bujak, Char]; Somers, Elaine [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9245abe34c643e2bb029f63da78af84-Somers, Elaine]; Peak, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d91e8031a31646439c7a33829c4ec926-Degering, Tracy]  
**Subject:** RE: US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Thanks Maryann – sounds like:

**Deliberative Process / Ex. 5**

~~Deliberative Process / Ex. 5~~

Linda



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**From:** Thiesing, Mary  
**Sent:** Friday, June 02, 2017 10:10 AM  
**To:** Bujak, Charissa <bujak.charissa@epa.gov>; Storm, Linda <Storm.Linda@epa.gov>; Somers, Elaine <somers.elaine@epa.gov>  
**Subject:** RE: US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Linda, et al,

All three of the alternatives brought forward in the FEIS were practicable. In the ROD, ITD/FHWA identified that the were choosing E-2 for safety reasons; however, there were no comparisons or information in the ROD indicating that E-2 was significantly safer than the other two. Since all 3 alternatives met AASHTO standards, and that was the only model information included, there isn't a compelling reason driving this choice. At least from my review of the documents.

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**From:** Bujak, Charissa  
**Sent:** Friday, June 02, 2017 10:06 AM  
**To:** Storm, Linda <Storm.Linda@epa.gov>; Thiesing, Mary <Thiesing.Mary@epa.gov>; Somers, Elaine <somers.elaine@epa.gov>  
**Subject:** RE: US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Awesome; thanks Linda!

For a quick update on our status: I am working on the briefing documents (now in Mary Anne's hands for review/improvement) and also the cover letter. As Tracy was previously extensively involved in this project and did a great job

commenting on the FEIS in 2015, she is taking the first stab at a draft comment letter or skeleton outline (thanks Tracy). Following that, we will then review/ add onto Tracy's first draft.

The process is moving along nicely and we will definitely keep folks in the loop! Mary Anne and Tracy, feel free to add any thoughts to this email ☺!

Thanks!

Cheers,

Charissa Bujak  
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**From:** Storm, Linda  
**Sent:** Friday, June 02, 2017 10:26 AM  
**To:** Somers, Elaine <[somers.elaine@epa.gov](mailto:somers.elaine@epa.gov)>; Bujak, Charissa <[bujak.charissa@epa.gov](mailto:bujak.charissa@epa.gov)>; Peak, Tracy <[Peak.Tracy@epa.gov](mailto:Peak.Tracy@epa.gov)>; Thiesing, Mary <[Thiesing.Mary@epa.gov](mailto:Thiesing.Mary@epa.gov)>  
**Subject:** RE: US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Elaine! This is a fantastic summary! Sounds like **Deliberative Process / Ex. 5**  
**Deliberative Process / Ex. 5** Combined with  
the additional concerns about impacts to Palouse Prairie it is unclear why they wouldn't choose that alignment (e.g.,  
have they claimed it's not practicable? **Deliberative Process / Ex. 5** I think we  
**Deliberative Process / Ex. 5** our letter can provide substantive information to support the Corps with the arguments for  
making the right decision on this.

This provides clear/succinct information to use in David's/others briefings. If there is a need for me to review the draft letter(s) or briefing documents, I am happy to and am interested in what direction David decides to take in terms of the letter's signature level.

Good luck ya'll!  
Linda



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**From:** Somers, Elaine

**Sent:** Thursday, June 01, 2017 9:51 PM

**To:** Bujak, Charissa <bujak.charissa@epa.gov>; Peak, Tracy <Peak.Tracy@epa.gov>; Thiesing, Mary <Thiesing.Mary@epa.gov>; Storm, Linda <Storm.Linda@epa.gov>

**Subject:** US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Hello, everyone,

A bit more information that may be of interest...

#### **IDFG**

I did have a conversation with Ray Hennekey of IDFG yesterday. It's a good thing, **Personal Privacy / Ex. 6** **Personal Privacy / Ex. 6** he'll be gone from the office from June 10 onward).

Ray re-stated the essence of IDFG's views on the project: They support the Central (C-3) alignment. C-3 has the least wetland impacts, least wildlife impacts, and it is supported by all the resource agencies.

Since we last spoke, he has been working with ITD on pipe crossings of the E-2 alignment. He conveyed that ITD consults with IDFG because they have to, but that they do what they want to do.

He said the only wildlife mitigation is to oversize some of the pipes (culverts) for small wildlife passage. For example, some 24" pipes may be increased to 36" or 48", or a 48" pipe increased to 60". The problem, however, is that the pipes are very long, and it is unlikely that wildlife will enter if it is dark, i.e., if they cannot see the end of the tunnel. A 24" pipe typically used for a 50-year event is increased to 36" or 48", so that when a stream is bank full, small wildlife could pass on the banks at either side, but sometimes the pipes will be full and will not be usable by wildlife.

For contacts at USFWS, Ray recommended Juliet Barrente, Spokane Office 509-893-8005 or direct line 509-921-0160. Or, speak with Juanita Lichthardt, Botanist at U of Idaho, Moscow, re: plant questions: 208-882-4803.

#### **Rare plant**

FYI -- On the call I mentioned that in recent years spanned by this NEPA process, ITD had bulldozed or buried (not intentionally as far as known) a rare plant population. It was Spalding's catchfly, *Silene spaldingii*, an ESA Threatened species. It may have occurred when they were building the other portions of US95 that were expanded, but which were covered by the original EA -- not included in this EIS. The PN states that no specimens of *S. spaldingii* have been located near the proposed project area since 2006.

#### **Aquatic resources impacts – data changes since the FEIS**

**From the FEIS (p. 172) Table 46. Tributary Effects:**

- **Alternative C-3:** 5 tributary crossings; 7,808 linear feet of channel effects; 58 acres total impervious surface
- **Alternative E-2:** 5 tributary crossings; **2,592 linear feet** of channel effects; 72 acres total impervious surface
- FEIS (p. 173): "Most of the wetlands that are affected drain into either the South Fork of the Palouse River or Thorn Creek, both of which are on the 303(d) list and are waters of the US."
- Mitigation (p. 173): "Once all practicable measures for avoidance and minimization are in place, remaining impacts will be mitigated through compensatory mitigation, which will be met through use of the Cow Creek Mitigation site, which has already been constructed."
- P. 174, Table 47, Wetland Effects: Alt C-3: 0.99 acre (all PEM); Alt E-2: 3.61 acres (2.69 PEM; 0.92 PSS)
- P. 176: "The E-2 Alt would affect more wetlands that are functioning higher for habitat. The C-3 Alt would have the least effect to wetlands in terms of acreage, function and value."

**From the Corps Public Notice:**

- **Alternative E-2:** Piping of **4,290 linear feet** of unnamed tributaries/drainages.

- Aquatic resource description: Both S. Fork Palouse River and Thorn Creek originate on Paradise Ridge. ES Comment/note: The E-2 impacts would affect the headwater areas (upstream of where Alts C-3 and W-4 are located), with higher likelihood of degrading water quality in upper (intermittent) stream reaches that may currently be unimpaired. Would also impair sensitive hydrological functions. E-2 is only alternative that impacts scrub-shrub wetlands, which are rare to non-existent elsewhere in the project area, and are high value to wildlife on Paradise Ridge.
- Permanent fill of 3.43 acres wetlands (3.23 PEM; 0.20 PSS)

Let me know if there is anything else I can do to assist. Juanita Lichthardt returned my call, but we have not yet spoken. If you have a particular question for her that you would like me to raise, let me know.

Thank you all so much!

Elaine